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October 20, 2020

**VIA ECF**

Honorable Loretta A. Preska  
U.S. District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**RE:** *United States v. Steven Donziger*, No. 19-CR-561 (LAP); 11-CIV-691 (LAK)

Dear Judge Preska:

Amendment to previously disclosed defense witnesses:

Instead of calling Patricio Salazar as a witness, we are requesting the testimony of his brother, Agustin Salazar, Attorney at Law.

This defense witness is a voluntary witnesses willing to appear in the SDNY for trial on or about November 6-11, 2020.

However, due to the global COVID-19 pandemic, travel to the U.S is prohibited for health reasons. Ecuador is currently at level 3 out of 4 on the COVID risk scale (avoid non-essential travel). Mr. Salazar would be required to quarantine for two weeks in New York, and then for two weeks upon his return to Ecuador. As a practicing attorney, he cannot cease his professional obligations for a month in order to testify during a global pandemic.

Further, my office has continued to attempt to contact the U.S. embassy in Ecuador's capital of Quito. The offices of the U.S. embassy are closed except for U.S. citizen emergencies or deaths.

Sincerely,

*/s/ Lauren C. Regan (electronic signature)*

Lauren C. Regan, OSB#970878

Attorney at Law

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